

**COMMONWEALTH OF MASSACHUSETTS  
BEFORE THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Petition of Cambridge Electric Light Company and	)	
Commonwealth Electric Company requesting	)	D.T.E. 00-83
approval of their Transition Charge Reconciliation filing	)	
	)	

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**WESTERN MASSACHUSETTS ELECTRIC COMPANY'S PETITION  
FOR LIMITED PARTICIPATION STATUS**

Western Massachusetts Electric Company ("WMECO" or the "Company") hereby submits its petition to the Department of Telecommunications and Energy ("Department") for limited participation status in the above-captioned proceeding, pursuant to 220 CMR 1.03(1)(e). The Company states the following in support of its petition:

1. WMECO is a Massachusetts electric company subject to the regulatory jurisdiction of the Department with a principle place of business at 174 Brush Hill Avenue, West Springfield, Massachusetts 01090-2010.
2. WMECO provides electricity service to customers in 59 cities and towns in Massachusetts.
3. WMECO is an operating company in the Northeast Utilities system, the largest electric utility system in New England, with operating subsidiaries in Massachusetts, Connecticut and New Hampshire.
4. On November 13, 2000, Cambridge Electric Light Company ("Cambridge") and Commonwealth Electric Company ("Commonwealth") filed

with the Department a Transition Charge Reconciliation Filing and proposed tariffs reflecting the proposed Transition Charges.

5. On September 17, 2001, the Department issued an Order of Notice stating that any person wishing to participate in the above-captioned proceeding must file a petition with the Department by September 24, 2001.

6. In conducting adjudicatory hearings, the Department may “allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose” as the Department may order. *See* G.L. c. 30A, § 10, cl. (4); *see, also*, 220 CMR 1.03(1)(b).

7. WMECO has a substantial and specific interest in intervening in these proceedings because Cambridge’s and Commonwealth’s filing addresses or will address significant issues relating to transition charge reconciliation standards. WMECO has submitted and will submit transition charge reconciliation filings and WMECO anticipates that a number of the issues raised in Cambridge’s and Commonwealth’s proceeding with respect to transition charge reconciliation standards will be similar to those raised in future proceedings involving WMECO. Accordingly, any decision by the Department in this proceeding will substantially and significantly affect WMECO.

8. WMECO, therefore, has a significant interest in the outcome of this proceeding and wishes to protect its interests and the interests of its customers by participating herein. No other party can adequately represent WMECO in this proceeding.

9. Department precedent supports the participation of regulated utilities in regulatory proceedings of other utilities when important policy matters of significant precedential value are under review. *Massachusetts Electric Company*, D.T.E. 98-69 (review of alternative streetlighting tariff); *Boston Edison Company*, D.T.E. 97-86 (sale of electric generating plants); *Massachusetts Electric Company*, D.P.U. 96-25 (review of electric restructuring settlement); *Boston Gas Company*, D.P.U. 96-50 (review of performance-based ratemaking proposals); *Cambridge Electric Light Company/Commonwealth Electric Company*, D.P.U. 91-234-A (integrated resource management); *NYNEX*, D.P.U. 94-50 (alternative regulation/performance-based regulation plan).

10. WMECO may have information that will aid the Department in its evaluation of the proposed service quality standards.

11. Given the above, WMECO is “substantially and specifically affected” by this proceeding as set forth in the General Laws and the Department’s regulations.

12. If granted limited participation status, WMECO will make every effort not to burden administratively this proceeding.

13. WMECO requests that all notices, testimony, pleadings and correspondence pertaining to these proceedings be directed to the persons identified below:

Stephen Klionsky, Esq.  
Western Massachusetts Electric Company  
260 Franklin Street, 21<sup>st</sup> Floor  
Boston, MA 02110

**WHEREFORE,** WMECO respectfully requests that the Department allow its petition for limited participation in this proceeding.

Respectfully submitted,

WESTERN MASSACHUSETTS  
ELECTRIC COMPANY

By its attorney,

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September 24, 2001